

## **REMARKS**

In the Office Action dated February 17, 2005, claim 10 was rejected under §112, second paragraph as being indefinite because the Examiner stated the relationship between “detecting tampering” and “tracking the location” was not made clear in the language of claim 10. Claim 10 has been amended to more specifically describe this relationship, and is submitted to be in full compliance with all provisions of §112, second paragraph.

Claims 1-9 and 11 were rejected under 35 U.S.C. §103(b) as being anticipated by Pauschinger et al. This rejection is respectfully traversed for the following reasons.

The subject matter disclosed and claimed in the present application is for the purpose of authenticating a printer unit that is component of a yet-to-be commissioned postage meter. Commissioning of a postage meter, as is well known in the art, is the procedure by which a postage meter is permitted by the relevant postal authority, such as the USPS, to frank mail. Commissioning occurs in an information exchange (communication) between the postage meter, at the time it is installed at the location of a user, and a data center remote therefrom. As explained in the introductory portion of the present specification, a postage meter machine typically consists of a base either physically connected to, or in communication with a meter, and the meter, in turn, either physically incorporates or is in communication with a printer unit. The present invention is directed to ensuring that the printer unit itself is approved or authorized for franking mail. This is accomplished in a communication between the postage meter machine that embodies the printer unit, and a data center remote from the postage meter machine. This procedure takes

place before the postage meter machine is commissioned, i.e., at a time when the postage meter machine is not authorized to frank mail in any manner. In this communication, an identification number uniquely associated with the printer unit is transmitted to the remote data center, where it is verified. Only if the printer unit is verified through its identification information is the postage meter machine then enabled, by the data center, to frank mail. In other words, unless and until the printer unit is verified, the postage meter machine completely lacks the capability of franking mail, because it has not been commissioned.

In rejecting the subject matter of claim 1 and claims 2-9 and 11 depending therefrom as being anticipated by Pauschinger et al., the Examiner has relied on teachings therein relating to the meter, and has over-generalized those teachings as allegedly applying to a printer unit in that meter. Obviously, the meter in the Pauschinger et al. system must include a printer unit, however, all of the teachings and disclosure of the Pauschinger et al. reference relate to identification steps being taken to identify the *meter* itself, and have nothing to do with an identification or verification of the printer unit in the meter. In the Pauschinger et al. system, the identity of the printer unit is invisible to the remainder of the system. The serial numbers and other identification information that are exchanged between the meter and the remote data center in the Pauschinger et al. system relate only to the overall meter itself, and do not provide the data center with any capability of determining whether the printer unit in the meter is, in fact, an approved printer unit.

In the Pauschinger et al. reference, moreover, the aforementioned informational exchange takes place in the context of a request for a monetary value made by the meter to the remote data center. If the meter's identification information

(such as the serial number) is verified at the data center, then the requested funds are released to the postage meter so that it can print the requested postage. The purpose of the Pauschinger et al. system, therefore, is to prevent a postage meter that has insufficient monetary funds stored therein from being used to print postage. This has nothing to do with verification of the printer unit.

The need for verification of the printer unit is a well-known problem in the art, as exemplified by United States Patent No. 6,574,000, which is submitted with the Information Disclosure Statement filed simultaneously herewith. In that reference, however, the problem is solved (addressed) in a completely different manner, as explained in the Information Disclosure Statement.

As the Examiner is aware, in order for a reference to anticipate a claim, the reference must put the claimed subject matter in the possession of the public. Clearly the Pauschinger et al. reference does not provide the public with any type of system for verifying the authenticity of a printer unit used in a postage meter machine, and therefore the Pauschinger et al. reference does not anticipate claim 1 or any of the claims depending therefrom.

The language of independent claims 1 and 8 as originally filed already made clear that the printer unit is a part of component of the overall meter, however, claim 1 has been amended to clarify this point. Claims 1 and 8 also have been amended to make clear that it is the printer unit itself that has the identification code associated therewith, and that this identification code is unique for that printer unit. For the reasons discussed above, the Pauschinger et al. reference does not anticipate either of the independent claims, or any of the claims depending therefrom.

All claims of the application are therefore submitted to be in condition for allowance, and early reconsideration of the application is respectfully requested.

Submitted by,



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